

Exhibit I

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PRIVATE LIMITED and UNILOC CORPORATION
PTY LIMITED

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

2010 NOV - 8 PM 12:12
CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

SYMANTEC CORPORATION and
XTREAMLOK PTY,

Plaintiffs,

vs.

UNILOC USA, INC., UNILOC
(SINGAPORE) PRIVATE LIMITED and
UNILOC CORPORATION PTY
LIMITED,

Defendants.

UNILOC USA, INC., UNILOC
(SINGAPORE) PRIVATE LIMITED and
UNILOC CORPORATION PTY
LIMITED,

Counterclaimant,

vs.

SYMANTEC CORPORATION and
XTREAMLOK PTY,

Counterdefendant

Case No. SACV10-01483 DOC (MLGx)

DEFENDANTS' COUNTERCLAIM

DEMAND FOR JURY TRIAL

Judge: Honorable David O. Carter
Courtroom: 9D

CLAIM FOR RELIEF

(By Uniloc USA, Inc., Uniloc (Singapore) Private Limited, and Uniloc Corporation PTY Limited Against Symantec Corp. and XstreamLok PTY)

Patent Infringement

8. Uniloc incorporates herein Paragraphs 1-7 of its Counterclaim above.

9. On February 6, 1996, United States patent number 5,490,216, entitled "System for Software Registration" ("the '216 patent"), was duly and legally issued to Uniloc, the present owner of the '216 patent. *See*, Complaint, Exh. A.

10. Uniloc is the exclusive licensee of the '216 patent in the United States and owns all substantial rights in the '216 patent in the United States including the right to sue for past, present and future infringement and to recover damages from all such infringement.

11. Uniloc has marked its products with the '216 patent number pursuant to 35 U.S.C. § 287.

12. On information and belief, Symantec and XstreamLok have directly and/or indirectly infringed at least one claim of the '216 patent in this judicial district and elsewhere in the United States by, among other things, making, using, offering for sale, selling and/or importing a system, device and/or method for reducing software piracy, reducing casual copying and/or reducing the unauthorized use of software, including without limitation Symantec's Norton AntiVirus 2010 product that permits customers to activate and/or register software. Pursuant to 35 U.S.C. § 271, Symantec and XstreamLok are thereby liable for direct and indirect infringement of the '216 patent which infringement has caused damage, reparable and irreparable, to Uniloc. The unlawful acts of Symantec and XstreamLok will continue unless and until their infringement is enjoined.

12. The infringement of the '216 patent by Symantec and XstreamLok has caused reparable and irreparable damage to Uniloc and Uniloc will continue to suffer damage for which remedies at law are inadequate unless each defendant is enjoined.

1 Considering the balance of the hardships between the parties, a remedy in equity
2 including injunctive relief is warranted and such a remedy would be in the public
3 interest. Uniloc, therefore, is entitled to injunctive relief under 35 U.S.C. § 283.

4 13. Symantec and XstreamLok have long had notice of the '216 patent due,
5 *inter alia*, to the prior licensing relationship between XstreamLok and Uniloc,
6 Symantec's acquisition of XstreamLok, the ongoing litigation between Uniloc and
7 Microsoft Corporation regarding the '216 patent, the pending litigation in this district
8 and the Eastern District of Texas regarding the '216 patent, and the press coverage
9 thereof. With such knowledge, Symantec and XstreamLok acted despite an
10 objectively high likelihood that their actions constitute infringement of the '216
11 patent. Symantec and XstreamLok have and had a subjective knowledge of such risk
12 and/or such risk is and was obvious to Symantec and XstreamLok. Nonetheless,
13 Symantec and XstreamLok have failed to cease their infringing activities or obtain a
14 proper license under the '216 patent. Accordingly, the infringement by Symantec and
15 XstreamLok has been willful, and this case is exceptional, entitling Uniloc to an award
16 of increased damages and attorneys' fees pursuant to 35 U.S.C. §§ 284 and 285.

17 **PRAYER FOR RELIEF**

18 WHEREFORE, Uniloc respectfully requests that the Court:

19 A. Enter judgment that Symantec and XstreamLok have infringed the '216
20 patent;

21 B. Enter judgment that the infringement of the '216 patent by Symantec and
22 XstreamLok is and was willful;

23 C. Preliminarily and permanently enjoin Symantec and XstreamLok, and all
24 persons acting on their behalf or in concert with them, from infringing, directly or
25 indirectly, the '216 patent;

26 D. Determine that the patent issues asserted herein should be resolved in the
27 Eastern District of Texas as aforesaid;

1 E. Award Uniloc damages and increased damages resulting from the
2 infringement by Symantec and XstreamLok of the '216 patent;

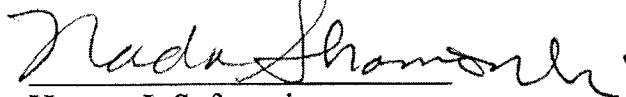
3 F. Award Uniloc its costs, expenses and reasonable attorneys' fees incurred
4 in this action, and

5 G. Award Uniloc such other and further relief as the Court may deem just
6 and proper.

7 Dated: November 8, 2010

Respectfully submitted,

8 MINTZ LEVIN COHN FERRIS
9 GLOVSKY AND POPEO P.C.

10 

11 Harvey I. Saferstein

12 Nada I. Shamonki

13 Attorneys for Defendants/
14 Counterclaimants
15 UNILOC USA, INC., UNILOC
16 (SINGAPORE) PRIVATE LIMITED and
17 UNILOC CORPORATION
18 PTY LIMITED


19 **DEMAND FOR JURY TRIAL**

20 Uniloc respectfully demands a jury trial in this action, as to all issues so triable.

21 Dated: November 8, 2010

Respectfully submitted,

22 MINTZ LEVIN COHN FERRIS
23 GLOVSKY AND POPEO P.C.

24 

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27 Attorneys for Defendants/
28 Counterclaimants
UNILOC USA, INC., UNILOC
(SINGAPORE) PRIVATE LIMITED and
UNILOC CORPORATION
PTY LIMITED

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 2029 Century Park East, Suite 1370, Los Angeles, California 90067. On November 8, 2010, I served the following documents:

DEFENDANTS' COUNTERCLAIM; DEMAND FOR JURY TRIAL

By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California, addressed as set forth below.

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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 8, 2010, at Los Angeles, California.


DIANE ENDO